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March 9, 2016

VIA ECF

The Honorable Jose L. Linares
United States District Court
District of New Jersey
50 Walnut Street, Court Room MLK 5D
Newark, NJ 07101

***Re: In Re Liquid Aluminum Sulfate Antitrust Litigation
Court File No. 16-md-2687 (JLL) (JAD)***

Dear Judge Linares,

We represent the first-filed case of Direct Purchaser Plaintiffs and a proposed class of Direct Purchasers in *Central Arkansas Water v. Reichl, et al.*, 2:15-cv-07827 (D.N.J.); *City of Siloam Springs v. Reichl, et al.*, 2:15-cv-08888 (D.N.J.); *City of Springdale, Arkansas v. Reichl, et al.*, 2:15-cv-08889 (D.N.J.); and *Beaver Water District v. Reichl, et al.*, 2:15-cv-08887 (D.N.J.). We write this letter pursuant to the Initial Scheduling Order entered on March 9, 2016, which directs counsel to advise the Court today as to whether they wish to support and/or seek the appointment as Interim Co-Lead Counsel and Plaintiffs' Steering Committee member. We respectfully submit this letter in support of the Court's appointment of Lisa J. Rodriguez of Schnader Harrison Segal & Lewis LLP as Interim Co-Lead Counsel for the Direct Purchaser Plaintiffs ("DPPs"), and for appointment of myself as a member to the Plaintiffs' Steering Committee.

As mentioned above, Plaintiff Central Arkansas Water filed the first civil antitrust action in this multidistrict litigation, which involves dozens of class actions brought on behalf of direct purchasers in the United States against Defendants for an alleged price-fixing conspiracy for Liquid Aluminum Sulfate from approximately 1997 through July 2010, in violation of Section 1

of the Sherman Act, 15 U.S.C. § 1. See *Central Arkansas Water v. Reichl, et al.*, 2:15-cv-07827 (D.N.J.).

Co-lead Counsel for the Direct Purchasers must satisfy the requirements of Federal Rule of Civil Procedure 23(g)(1)(C)(i) to efficiently manage the litigation with the requisite qualifications and skill. We propose that Lisa J. Rodriguez be appointed as Interim Co-Lead Counsel for the DPPs, for she satisfies all requirements set forth in Federal Rule of Civil Procedure 23(g)(1)(C)(i), and is “best able to represent the interests of the class.” Fed. R. Civ. P. 23(g)(2)(B).

In appointing Interim Co-Lead Counsel, the Court considers: (a) the work counsel has done in identifying or investigating potential claims in the action; (b) counsel’s experience in handling class actions, other complex litigation, and claims of the type asserted in the action; (c) counsel’s knowledge of the applicable law; and (d) the resources counsel will commit to representing the class. *See Fed.R.Civ.P. 23(g)(1)(C)(i)*. As set out in Ms. Rodriguez’s submission to the Court in support of the appointment, the exceptional qualifications and extensive experience of Ms. Rodriguez and her firm demonstrate that she satisfies all requirements of Federal Rule of Civil Procedure 23(g)(1)(C)(i). Ms. Rodriguez’s performance record has repeatedly proven her ability to litigate similar complex class action cases and will ensure the efficient organization of the legal work, strategy, and decision-making that will occur in litigating this action.

Further, Ms. Rodriguez is highly qualified to represent DPPs fairly and adequately. *See Fed. R. Civ. P. 23(g)(1)(B)*. Given Ms. Rodriguez’s and her firm’s expertise and experience in complex litigation and class action practice, electronic discovery, case investigation, settlement negotiation and trial advocacy, their collective manpower, and the quality of the lawyers, we believe that Ms. Rodriguez and her firm are distinctly suited to serve as Interim Co-Lead Counsel. Ms. Rodriguez has also worked cooperatively with most of, if not all, the firms representing a plaintiff in this action. Accordingly, appointment of Ms. Rodriguez as Interim Co-Lead Counsel for the DPPs is consistent with Federal Rule of Civil Procedure 23(g), as well as with the Manual (Fourth)’s recommendations to establish an organizational structure for counsel to aid “efficiency and economy” in the litigation. *See Manual (Fourth) § 10.221*.

I seek the appointment as a member to Plaintiffs’ Steering Committee. My firm and I have significant practices in complex commercial litigation and have represented businesses in antitrust and unfair and deceptive trade practices cases. We possess substantial leadership experience in complex class actions, particularly, cases involving allegations of price-fixing in violation of Section 1 of the Sherman Act.

My extensive experience in class action litigation includes appointments as co-lead counsel, class counsel, and to plaintiffs’ executive committees. *See Exhibit “A”*, attached hereto, for a Resume of Roberts Law Firm, P.A. and complete list of significant cases. My partial leadership experience includes the following: serving as Co-Lead Counsel *In Re Microsoft Antitrust Indirect Purchaser Litigation* in Arkansas, which reached an early settlement; serving as Co-Lead Counsel *In Re Pilot Flying J Rebate Litigation*, a nationwide class action which settled within two months from plaintiffs’ initially-filed complaint; serving as Co-Lead Interim

Counsel in *In re Parking Heaters Antitrust Litigation*; and Co-Lead Counsel *In Re Aftermarket Automotive Sheet Metal Antitrust Third Party Purchaser Litigation*.

I am licensed to practice law in five states and am in good standing in Arkansas, Florida, Tennessee, Texas, and New York. I am also licensed before the United States Supreme Court and several U.S. Federal District Courts.

As outlined above, we respectfully support and submit that Lisa J. Rodriguez of Schnader Harrison Segal & Lewis LLP possesses the requisite qualifications and experience to serve as Interim Co-Lead Counsel for the DPPs. We respectfully submit that my firm and I possess significant qualifications and experience to serve on the Plaintiffs' Steering Committee.

We thank the Court for its consideration on this proposal.

DATED: March 9, 2016

Respectfully submitted,

/s/ Michael L. Roberts

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cc: All Counsel of Record (via ECF)